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Certified Public Accountants

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February 28, 2009

2009 MAR 13 A 10:16

Mr. Daniel T. Buckley
Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Buckley:

Our client, United Association Political Education Committee (UAPEC), has instructed us to respond to your notice dated January 16, 2009. I apologize for the late response, as I was working out of town the first three weeks of February. You can see from the Committee's history that they always respond to your inquiries in a timely fashion.

The notice inquires about the 12 Day Pre General Report and that totals listed on Lines 11(a)(i) and 11(a)(ii), Column B may be incorrect.

The Amended September Monthly Report Line 11(a)(i), Column B reported \$4,600.00. The 12 Day Pre General Report Report Line 11(a)(i), Column A reported \$1,460.00; therefore column B appears correct at \$6,060.00.

The Amended September Monthly Report Line 11(a)(ii), Column B reported \$1,289,204.13. The 12 Day Pre General Report Line 11(a)(ii), Column A reported \$25,280.00; therefore column B appears correct at \$1,314,484.13.

The \$5,000 contribution to Donald Cazayoux made on October 3, 2008 was for the Louisiana primary election. Governor Jindal postponed the Louisiana primary that was scheduled for September 6, 2008. The rescheduled date was October 4, 2008. This contribution was reported correctly.

The Committee will request that the \$5,000 excess contribution to the Missouri State Democratic Committee be refunded.

The Committee will request that the \$225 excess contribution to the Kathleen Dahlkemper campaign be refunded.

The \$3,000 contribution to Deborah Halvorson dated September 25, 2008 was voided in December, 2008. This is reflected in the Committee's January 31, 2009 year end report.

The \$5,000 contribution to the Kay Barnes campaign was returned to the Committee. This voided check will be reflected in the next Committee's report, March 20, 2009.

The \$5,000 contribution to Adam Schiff for Congress dated October 10, 2008 was reported incorrectly. The correct amount of the check was for \$2,500. An amended report will be filed to correct this error.

The Independent Expenditures were reported in Schedule E of the 12 Day Pre General Report.

If you should have any further questions, please contact me.

Sincerely,



Jerome J. Robertson, CPA



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 16, 2009

William P. Hite, Treasurer
United Association Political Education
Committee
901 Massachusetts Avenue, NW
Washington, DC 20001-4307

Response Due Date:
February 17, 2009

Identification Number: C00012476

Reference: 12-Day Pre-General Report (10/1/08-10/15/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.
2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the "Special-Primary" election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been

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UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE

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designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee and its affiliates from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

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Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

4. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

5. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second

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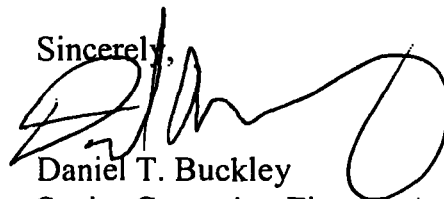
day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers from affiliated committees should be properly disclosed on a separate Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,



Daniel T. Buckley
Senior Campaign Finance Analyst
Reports Analysis Division

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UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE

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Contribution After Election Date

Recipient Name	Date	Amount	Election	Election State - Date
DONALD J CAZAYOUX	10/03/2008	\$5,000	"Special-Primary"	LA-06 Special Primary - 03/08/08

Excessive Contribution To a Committee

Recipient Name	Date	Amount	Report
MISSOURI DEMOCRATIC STATE COMMITTEE	10/10/2008	\$10,000	2008 12-Day Pre-General

Excessive Contribution To a Candidate

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Kathy Dahlkemper For Congress	06/06/2008	\$225	G-2008	2008 July Quarterly	C00163477
KATHLEEN ANN DAHLKEMPER	10/01/2008	\$5,000	G-2008	2008 12-Day Pre-General	C00012476
DEBORAH 'DEBBIE' HALVORSON	09/25/2008	\$3,000	G-2008	2008 October Monthly	C00012476
DEBORAH 'DEBBIE' HALVORSON	10/07/2008	\$3,000	G-2008	2008 12-Day Pre-General	C00012476
KAY FOR CONGRESS	01/11/2008	\$5,000	G-2008	2008 April Quarterly	C00206177
KAY BARNES	10/10/2008	\$5,000	G-2008	2008 12-Day Pre-General	C00012476
Adam Schiff for Congress	09/27/2007	\$2,500	G-2008	2007 October Monthly	C00012476
Adam Schiff for Congress	10/10/2008	\$5,000	G-2008	2008 12-Day Pre-General	C00012476

ck
VOID
12/06

ck
Return

Missing 48-Hour Notice

Name of Payee	Date	Amount	Purpose	Candidate
Clear Images	10/01/2008	\$50,279.25	Mini Billboard, Signs	BARACK OBAMA

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked <i>2/28/07</i>
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>Jm D</i> PREPARER	<i>3/13/07</i> DATE PREPARED

(3/2005)

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